

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GILBERT JAMES,

Plaintiff,

v.

Civil Action No. 3:11cv00221

ENCORE CAPITAL GROUP, INC., *et al.*

Defendants.

MOTION FOR AN EXTENSION OF TIME

Defendants, Encore Capital Group, Inc., Midland Funding, LLC and Midland Credit Management, Inc. (collectively, "Midland"), by counsel, pursuant to Fed.R.Civ.P. 6(b)(1) and Local Rule 7(F)(2)(b), files this motion for an extension of time to and including June 20, 2011, within which to file their responsive pleadings to the Complaint filed by plaintiff, Gilbert James, and states as follows:

Midland's counsel continues to review the allegations of the Complaint and requires additional time to respond to the same. Midland's counsel has communicated with counsel for plaintiff, Gilbert James, who has agreed to the requested extension. A proposed Agreed Order has been circulated for endorsement by counsel for plaintiff, Gilbert James, and Midland, a copy of which is attached hereto as Exhibit 1.

WHEREFORE, Defendants, Encore Capital Group, Inc. Midland Funding, LLC and Midland Credit Management, Inc., by counsel, hereby requests that the Court enter an Order: (1) granting Midland's Motion for an Extension of Time; (2) providing Midland with an extension of time to file its responsive pleadings to the Complaint until on or before June 22, 2011; and (3) awarding Midland such further relief as the Court deems appropriate.

**ENCORE CAPITAL GROUP, INC.,
MIDLAND FUNDING, LLC and
MIDLAND CREDIT MANAGEMENT, INC.**

By:/s/ David N. Anthony

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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of May, 2011, I electronically filed the foregoing Motion for an Extension of Time with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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